

IN RE: Lisa M. Williams  
Debtors

Lisa M. Williams  
Movant  
v.

SN Servicing Corporation as  
servicer for U.S. Bank Trust  
National Association, as Trustee of  
LB-Cabana Series IV Trust  
KENNETH E. WEST- Trustee  
Respondents

Case No.: 20-11627-pmm

Chapter: 13

Judge: Patricia M. Mayer

**RESPONSE TO DEBTOR'S MOTION TO REIMPOSE AUTOMATIC STAY**

**PLEASE TAKE NOTICE** that SN Servicing Corporation as servicer for as servicer for US Bank Trust National Association as Trustee for LB-Cabana Series IV Trust ("Secured Creditor"), the holder of a mortgage on real property of the debtor's, located at 5617 1/2 North Palethorp Street, Philadelphia, PA 19120 (Mortgage Premises"), by and through its undersigned attorneys, hereby responds to the Debtor's Motion to Reimpose the Automatic Stay as follows:

1. Admitted.

2. Denied. Creditor is without sufficient information as to form a belief as to the veracity of this averment and it is therefore denied. Without waiving the foregoing and by way of further response, it is specifically denied that Debtor made all post-petition payments. As of the time of filing of this instant Response, Debtor would be due for the February 1, 2023, post-petition payment had relief not been granted on March 9, 2023, at Doc. 74 following Creditor's filling of an unopposed Certification of Default. Moreover, Debtor has not provided proof of a lump sum amount to reinstate this fourteen (14) month delinquency.

3. Denied. For the foregoing reasons, Creditor requests that the Court deny Debtor's Motion to Reinstate the Automatic Stay.

all other and further relief as is just and proper.

Dated: April 9, 2024

By: /s/Lauren Moyer

Lauren Moyer Esq.

FRIEDMAN VARTOLO, LLP

Attorneys for Respondent,

SN Servicing Corporation as Servicer for US Bank

Trust National Association as Trustee for LB-

Cabana Series IV Trust

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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**ORDER**

**AND NOW**, this 9th day of April, 2024, upon consideration of Debtor's Motion to Reimpose the Automatic Stay filed on March 27, 2024, and the Response and Objection of SN Servicing Corporation as servicer for US Bank Trust National Association as Trustee for LB-Cabana Series IV Trust, it is hereby **ORDERED** and **DECREED** that the Debtor's Motion to Reimpose Automatic Stay is **DENIED**.

**BY THE COURT:**

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Patricia M. Mayer, Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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**CERTIFICATE OF SERVICE OF RESPONSE AND OBJECTION TO DEBTOR'S MOTION  
TO EXTEND AUTOMATIC STAY**

I certify that I caused to be served the Response and Objection to Debtor's Motion to Extend Automatic Stay of SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of the Cabana Series IV Trust on the persons at the addresses specified below or on the attached list on April 9, 2024.

The type(s) of service made was first-class mail and electronic notification as indicated on the attached list.

Date: April 9, 2024

FRIEDMAN VARTOLO, LLP.

By: /s/Lauren Moyer  
Lauren Moyer Esq.  
FRIEDMAN VARTOLO, LLP  
Attorneys for Respondent  
1325 Franklin Avenue, Suite 230 Garden  
City, New York 11530  
T: (212) 471-5100  
F: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

**Service by NEF**

**Trustee**

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

**Debtor's Counsel**

MICHAEL A. CIBIK  
Cibik Law, P.C.  
1500 Walnut Street  
Suite 900  
Philadelphia, PA  
19102

**U.S. Trustee**

Office of the U.S. Trustee  
Robert N.C. Nix Federal Building Suite 320  
Philadelphia, PA 19107

**Service by First-Class Mail**

**Debtor**

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19120 PHILADELPHIA-  
PA